Internal deliberative December 20, 2021

Overview of the ABP status and comments received:

Timing:

- Draft streamlined ABP template sent for key WG member review. OPPT developed an ABP template for all chemicals and the template was sent to key workgroup members (from all chemicals) for review November 9.

- Comments were received by November 17, and revisions were done to the ABP template based on those comments.
- Draft streamlined ABP template sent to all WGs for comment. The revised ABP template was shared with workgroups shortly after, but no later than November 30 (not all workgroups received the template at the same time).
- Workgroups had until December 15 to provide comments (not all workgroups had the same deadlines, some provided comments earlier).

Comments:

Vast majority of the workgroup comments were on the economic analysis.

Ex. 5 Attorney Client (AC)

- For most ABPs (exception TCE), most workgroup members other than OGC had extremely small amount of edits and comments (including from OP and ORD, who were the primary offices interested in the blueprints).
- There is very little chemical-specific information in each of these ABPs, even after workgroup review. Chemical-specific text is still color-coded for ease of review.
- A particular challenge is how to incorporate comments from one chemical into other chemicals. There are two situations:
 - some workgroup members indicated that their comment should be applied to the template, but the same comment was not made by the same workgroup member or the same office in other chemicals.
 - the reverse is also an issue, workgroup members had comments not marked as template, but the comments have implications for the ABPs of all chemicals, particularly in the economics section.

- Highlight of overarching comments:

Ex. 5 AC/DP

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 For the schedule, OGC and OCHP are interested in seeing non-RM items such as fenceline analysis and revised RD, as well as an inventory of documents to expect (suggestion not accepted)

- OP edits requesting details in the economic section, focused on how EPA was planning on conducting various analyses.
- OP and OCHP comments on how to use the EJ Screen tool, but suggestions not always accepted since comments were more appropriate for the fenceline analysis.
- Rule-specific notable comments/edits (as summarized by the rule leads)
 - o TCE

Ex. 5 Deliberative Process (DP)

o 1-BP

Ex. 5 Deliberative Process (DP)

Next steps

• Schedule: To keep to our schedule of OS for these chemicals in April, these are the upcoming tasks (same for each of these 5 chemicals):

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Analytic Blueprint	ABP - BC review ends	21-Dec-21	
Analytic Blueprint	ABP - DD review ends	27-Dec-21	
Analytic Blueprint	ABP - OPPT IO review ends	30-Dec-21	
Analytic Blueprint	ABP to RSB; starts FAR-like process	04-Jan-22	
Analytic Blueprint	ABP ends FAR-like process	19-Jan-22	
Analytic Blueprint	ABP revisions made + BC review	28-Jan-22	
Analytic Blueprint	ABP revisions - DD review	02-Feb-22	
Analytic Blueprint	ABP revisions - OPPT IO review	07-Feb-22	
Analytic Blueprint	ABP - OCSPP IO review	10-Feb-22	
Analytic Blueprint	ABP - AA approval	14-Feb-22	
Options Selection - NPRM	Workgroup finalizes options selection materials (one work week after ABP is approved)	22-Feb-22	